Robson Valley Timber Supply Area
Summary of Public Input
B.C. Ministry of Forests

Robson Valley, Summary of Public Input

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Robson Valley Timber Supply Area, Summary of Public Input

Robson Valley Timber Supply Area

Timber Supply Review

Summary of Public Input

B.C. Ministry of Forests
Robson Valley Forest District
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This is a summary of the public input that has been received on the Timber Supply Review in the Robson Valley Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

Background

As part of the review of timber supply in the Robson Valley Timber Supply Area, the British Columbia Forest Service distributed the *Discussion Paper* and two technical reports—the *Timber Supply Analysis* and the *Socio-Economic Analysis*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information. This report summarizes the input received during the 90–day review period. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut for the Robson Valley Timber Supply Area.

The first section of this summary, Public Review Process and Response, outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section, Public Input, summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Robson Valley Forest District office.

Public Review Process and Response

Robson Valley District Staff actively solicited public input on the Timber Supply Review in the Robson Valley Timber Supply Area through the following actions:

- the three documents were distributed at public meetings. The *Discussion Paper* included a response form which readers were encouraged to complete and return to the district manager
- four information sessions were held with representatives from the forest industry, labour, local governments and other interest groups (see Table 1)
- open houses were held in McBride and Valemount
- newspaper articles were encouraged

As Table 1 shows, many individuals attended the information sessions and the open houses. The Robson Valley Forest District also received five completed response forms, 19 written submissions and 36 form letters (see Appendix 1). Many articles were written in the local newspapers, and the editorials maintained a lively discussion.

Organizations (No. of participants)	Date
Information sessions	
Industry Representatives (4)	April 25, 1995
Forestry workers (20)	May 1, 1995
Land and Resource Management Plan participants (20)	May 12, 1995
Valemount and McBride Council & Regional District representatives (12)	May 30, 1995
McBride Economic Development Committee (8)	June 20, 1995
Open Houses	
McBride (7)	April 25, 1995
Valemount (11)	April 27, 1995

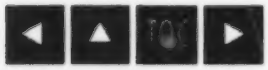
Table 1: Participation in public information sessions

Public Input

In this section, public input on the information presented in the three Timber Supply Review documents for the Robson Valley Timber Supply Area is summarized under the following headings:

- Timber Supply Analysis
- Socio-Economic Analysis
- Discussion Paper

Public input on other ongoing government processes that may influence the timber supply in the Robson Valley Timber Supply Area in the future is summarized at the end of this section.



Timber Supply Analysis

- **General**

One industry submission comments that the classification of areas in the timber supply analysis was factual and definitely indicative of the current management of the area. Another suggests that the analysis does not address the management of the large proportion of mature forest exposed to losses from insects, disease and windthrow. Another industry submission suggests the short-term timber supply may be lower than projected and the operable and inoperable volumes are not correct.

- **Inventory**

One industry submission contends the forest inventory incorrectly labels hemlock as fir.

- **Site productivity**

An industry submission states site index methodology is influenced by the preponderance of mature old growth, which causes an underestimate of growth. It therefore presents a conservative approach to the assumptions used in the analysis. The respondent states better information from paired plot work may reduce the uncertainty around these estimates.

- **Timber harvesting land base**

Several comments express concern that the 1 per cent removed for riparian areas is not enough. Three respondents propose a range of 1.5 per cent to 3 per cent, and one proposes a range of 5 per cent to 10 per cent.

- **Growth and yield predictions**

One industry submission proposes that the mean annual increment of 2.4 cubic metres per hectare per year—assigned to areas designated "partial cut" in the Forest Service analysis—be applied to all regenerated stands, resulting in a long-term timber harvest level of 480,820 cubic metres per year.

One submission questions the assumption that plantations will grow as planned because far too little is known about how forests develop and how they are affected by erosion, single species plantations, over-roading, and leader weevil and hemlock looper infestations.

Another submission states that yields in regenerated stands are predicted to be much lower than those used in the Forest Service analysis.

An industry submission suggests that with the uncertainty in the yield predictions and minimum

harvestable ages there is the potential to maintain the AAC for another decade.

- **Silviculture**

Industry input suggests that improved or enhanced silviculture treatments may serve to increase the managed stand volumes in future years.

- **Green-up and other forest cover requirements**

One submission states that on small, steep-slope streams the hydrological conditions needed to maintain fisheries are not reached until planted trees are 12–15 metres high; therefore the green-up requirements of 3–5 metres used in the analysis are insufficient. The respondent further suggests that the forest cover requirements used in analysis do not fulfill integrated resource management objectives.

Two industry submissions indicate that the visual quality objectives should be reduced.

- **Wildlife**

One submission states wildlife-sensitive areas and preservation areas for wildlife other than caribou are necessary.

Socio-Economic Analysis

- **Employment and community impacts**

One respondent disputes the statement in the *Socio-Economic Analysis* that "the major concerns relate to forest management methods...rather than the harvest level itself." While there are major concerns regarding forest management methods, there is a huge public concern about harvest levels. Furthermore, the respondent states there is an awareness that the current harvest level is unsustainable in the long term. The input includes a summary of the 1990 campaign by locals to retain the existing harvest level, rather than allow an increase for a temporary licence. It indicates that when the licences expire the allowable annual cut should revert to 500,000 cubic metres.

One submission asserts there was no discussion of the advantages of the various harvest flow scenarios to factors like tourism, health, agriculture, biodiversity etc.

Another respondent suggests that people are moving to the valley for the lifestyle and environment it offers and that this has improved the economy. The submission states there are fewer people making their living in logging than before, so maintaining the present allowable annual cut may not preserve jobs.

One submission states that since only 33 per cent of the workforce in the Robson Valley Timber Supply Area depend on the forest industry, and 67 per cent of the workforce does not, this indicates opportunities outside of the forest industry are not limited.

A submission from the Ministry of Environment, Lands and Parks maintains the *Socio-Economic Analysis* does not accurately describe the impacts of decreases in allowable annual cut because it is based on an allowable harvest level that has not been achieved over the last few years. The assumed workforce and revenue to the Crown described in the report have not developed so cannot be lost.

An interest group submission states the *Socio-Economic Analysis* does not accurately represent the economy within the valley and makes the following comments:

> • the use of person-years underestimates employment. The majority of forest harvesters in the valley don't work year-round but forestry is still their only source of income. These workers should be counted as one job and one full person-year, not a partial one. The system used by the *Socio-Economic Analysis* has probably cut the labour force by half, which has, in turn, also reduced the spin-off economy estimates. The *Socio-Economic Analysis* also reduced the person-years at the mills since part of wood manufactured was obtained outside the timber supply area. It does not matter where the wood comes from; the economy generated from its manufacturing is largely spent within the timber supply area. The workers associated with the 16 person-years the study has netted out still live here, spend wages here, and use local facilities

- a reduction in the allowable annual cut will immediately affect everyone employed in the valley, including managers, logging company owners and clerical staff

- no interviews were carried out with the forest and mill workers

- people will not remain within the valley and depend on unemployment insurance or social assistance until they can find another job

The following points were included in the above interest group submission and were also mentioned in industry input.

- a significant portion of the public sector is employed by the Forest Service, the Ministry of Environment, Lands and Parks, and the Department of Fisheries and Oceans. Acknowledgement should be made of their part in the forest sector since reductions in cut levels must eventually impact public service staff. One submission suggests that a large portion of the other public sector jobs should also be attributed to the forest sector. Another estimates that the dependence of the communities on forestry is closer to 40 per cent than 33 per cent

- a substantial amount of the labour force included in the tourism sector is directly dependent on workers visiting the area on forest-related business. Other submissions suggest that most of the highways through the Robson Valley are not a destination for tourists, but rather a travel corridor

- several respondents question whether the *Socio-Economic Analysis* accounted for the fact that the majority of farms within the Robson Valley supplement their income with work in the forest industry

- one submission suggests that the forest industry is, in large part, responsible for any tourism industry in the Robson Valley. Forest roads are used to access the mountains where most of the recreational tourism occurs

One forest industry submission comments that the urban centres where most of the forestry workers probably live experienced less population decline than other areas.

One respondent says that many people in the forest industry are also involved in agriculture and therefore could not replace the lost income by doing silviculture work during summer months.

One industry submission notes the *Socio-Economic Analysis* did not mention that the shipping of waste products from a local mill to other value-added manufacturing facilities in the province contributes to the provincial economy.

Another industry submission states the current harvest from the timber supply area is utilized and needed by the licensees. Normal quota wood has been unavailable lately due to Protected Areas Strategy deferrals and Forest Practices Code changes that have delayed cutting permit approvals. The submission also comments that capital investments have been made based on current allowable annual cut levels.

An industry submission contends that the *Socio-Economic Analysis* does not reliably portray the economic situation in the Robson Valley Timber Supply Area. As a major employer in the area, the respondent was not contacted or acknowledged as existing in the *Socio-Economic Analysis*. The report lacked facts, relying instead on "pseudo-environmental theory." The respondent questions the timber values used and suggests they may be 50 per cent too low.

Another industry submission questions the average annual stumpage fee of $9.44 per cubic metre used. It notes a stumpage rate for the seven months ending May 31, 1995, of $26.34 per cubic metre. This casts in doubt the accuracy of the $5.6 million in 1994 stumpage revenues reported in the *Socio-Economic Analysis*.

A community submission expresses concern with the impact estimates of harvest level reductions on the people of Valemount being based on past experience when local mills were not fully operating. Social problems such as family violence and alcohol and substance abuse increased, many businesses closed, commercial buildings were vacant, and real estate properties were sold at far below replacement value. The respondent suggests that the provincial ramifications of these sorts of problems must be considered. They place a heavy burden on the health and welfare system at a time when the provincial business and personal tax revenues are reduced, and school, hospital and local government property tax revenues decrease.

One submission points out that there was no indication of the cost of forestry to the tax-paying public—administration, aid to industry, wear and tear on the roads, effects on health from chemicals, smoke, the hazards of logging, unemployment insurance, etc.

- **Environmental impacts**

A Ministry of Environment, Lands and Parks submission states that the *Socio-Economic Analysis* lists the amount of reserved caribou habitat as 4.2 per cent; however, that has recently been reduced to about 3.5 per cent. Also, it notes that about three-quarters of the productive forest base included in this total is in the upper parts of the Engelmann Spruce–Subalpine Fir biogeoclimatic zone and is a very slow-growing forest. It, therefore, contributes to a relatively lower degree to the long-term wood supply in the district.

The same submission states that much of the wide variation in resident hunter-days from year to year, as reported in the *Socio-Economic Analysis,* is due to small sample sizes rather than major changes in real numbers. There has probably been a real increase in hunter-days for white-tailed deer as the population has increased. There has been a major decrease in hunter-days for grizzly bears as a result of a significant change in hunting regulations.

- **Corrections**

One submission points out that the *Discussion Paper* (page 4) mentions that 2 per cent of the allowable annual cut is unallocated, whereas in the *Socio-Economic Analysis* (page 32) it is only 0.2 per cent.

An industry submission offers a correction to the statement on page 33 of the *Socio-Economic Analysis* that a reduction of 27,000 cubic metres in harvest volume would shut the Zeidler Forest Industries Ltd. mill down for one month. In fact, the mill would shut down for 30 operating days (5 operating days per week). Therefore, the correct statement is six weeks or one and a half months. In all likelihood salaried mill and woodlands staff would not be reduced (i.e., fixed labour component), but hourly employees would be laid off for six weeks. In addition, another 70–80 workers employed by logging, hauling and silviculture contractors, would not be paid for six weeks.

Discussion Paper

- **Merchantable timber in existing mature forests**

Two industry submissions contend merchantable volumes in the existing mature forests are generally equal to or greater than inventory volume estimates. One suggests the allowable annual cut should not be adjusted until the completion of a new inventory and subsequent timber supply review.

- **Amount of riparian area**

An industry submission states the Forest Practices Code will determine the impact of riparian management over the next few years. It recommends the estimate used in the Forest Service analysis be accepted until a full impact assessment is completed.

- **Rate of harvesting in older cedar–hemlock forests**

The 36 form-letter respondents and an interest group submission maintain that lower-grade cedar, which was not included in the timber harvesting land base, is becoming increasingly valuable and should be included. An industry submission concurs and points to the recent commitment by quota holders to harvest the hemlock looper-killed timber in the northwest portion of the timber supply area as an example of a poor-quality wood source that will now be fully utilized.

A respondent from the Ministry of Environment, Lands and Parks questions whether the Interior Cedar–Hemlock types should have been included in the timber harvesting land base since they have been largely avoided by the major licensees to date. It also questions their use in the future given the wood profile requirements of these licensees.

One submission maintains many stands typed as leading spruce in the Interior Cedar–Hemlock zones are actually nearly pure western hemlock. This results in a considerable overestimate of merchantable volume because hemlock is under-utilized. It further states that these nutrient-poor and often subhydric sites may be very difficult to regenerate, compared to spruce-leading sites.

- **Partition**

One industry respondent suggests that old cedar must be harvested every year along with other species because 17 per cent of the operable land base is cedar–hemlock.

- **Estimated number of harvesting entries**

An industry submission contends the number of harvesting entries should be site-specific by drainage. The impact of harvesting-entry variations will be more fully known when the Robson Valley Round

Table completes its management plan. Many of the partial-cut and selective logging systems allow removal of as much volume as a normal three-pass system.

- **Estimated unsalvaged timber losses**

An interest group submits that harvesting should occur in all areas where severe insect infestation and resulting mortality has occurred, whether or not the area is affected by visual quality objectives.

Three industry submissions suggest that unsalvaged losses could be decreased with improved access to many areas. One also proposes the possibility that new logging systems such as helicopter or skyline will permit recovery of a higher percentage of pest, disease and wildfire losses. Two submissions note that this could increase the harvest level in the timber supply area. One states the aggressive salvage program at the western border of the timber supply area in hemlock looper-damaged timber will reduce unsalvaged losses.

One respondent disagrees with a temporary increase in the allowable annual cut to address the hemlock looper salvage situation. The higher the allowable annual cut, the more difficult for the local economy to adjust to a sustainable level of harvest.

- **Practices in caribou habitat**

Several industry and one interest group submission contend that the restrictions for caribou management are very conservative. The respondents suggest that caribou habitat can be integrated with timber harvesting to maintain certain age classes, movement corridors and canopy closures to meet the needs of the caribou. The forested areas currently suitable to caribou habitat will not remain the same through succession.

Two industry submissions state that caribou management is undergoing considerable refinement as more complete data becomes available. On a site-specific basis, the Ministry of Environment, Lands and Parks has fine-tuned its elevation line, allowing harvesting in areas not included in the timber harvesting land base.

One submission recommends information be gathered to confirm the use of these areas as winter habitat. Another states that very few caribou utilize the Robson Valley. Another questions the need for a 250-year rotation in the "caribou medium" zone, noting that the caribou currently graze in clear-cuts in these areas like deer. Another respondent predicts logging methods that prove successful in the medium zones may eventually be allowed in the "caribou high" zones that currently allow no resource extraction.

- **Minimum harvestable ages**

One industry submission accepts the range of minimum harvest ages used in the timber supply analysis, while a public submission suspects the minimum harvestable ages will be at least 20 years longer. Another public submission suggests the ages may be under-estimated for second-growth spruce due to severe leader weevil damage in the Robson Valley.

- **Combined impacts of integrated resource management practices**

The 36 form letters state that, for the most part, the environmental restrictions used in the analysis are too stringent. The respondents submit that if operations can continue in all forested areas, it will be possible to manage for special values as well as maintain an acceptable level of harvest and

construction.

The form letters and two other submissions recommend that old growth and standing dead timber be harvested, if still merchantable, to minimize losses to disease, blowdown, insects and fires. Large areas of overmature timber are likely a result of Forest Service fire protection, and would not have resulted if nature was left alone.

One submission questions whether all resources are considered before management decisions are made, because most of the lower-elevation forest is included in the timber harvesting land base.

Another submission urges the elimination of clearcutting, the encouragement of selective logging, and the banning of aerial spraying of pesticides.

- **Partial cutting**

The industry submissions express concern over the potential impact of the visual quality objectives on timber supply. Several state that various forms of selective and/or retention harvesting and visual quality techniques would allow significantly increased opportunities for harvesting in the visually sensitive areas. One submission proposes that major licensees be given a portion of the Robson Valley corridor to manage under their forest licences for the purpose of developing selective harvest systems and expertise in:

- second-growth and old-growth stands
- conventional ground skidding
- steep slopes requiring cable systems

This will provide initiative to the companies to operate in a successful manner and, therefore, be able to retain their harvest levels.

An interest group submission notes that a significant area has been excluded from the timber harvesting land base as environmentally sensitive areas and proposes that partial cutting in all viable area in this classification be considered.

- **Harvesting forests currently not considered harvestable**

An industry submission suggests that since the timber supply analysis was initiated all timber has become more valuable and economical to harvest and that this could lead to an increase in timber supply. The respondent lists the following opportunities:

- the use of alternative harvesting methods on steep slopes and in environmentally sensitive areas. Some of the alternative methods are currently being used in the timber supply area
- a reduction in the operability minimum volume per hectare. Again, there are examples where harvesting has occurred in areas having less volume than the minimums
- the rehabilitation of problem forest types

The 36 form-letter respondents and an industry submission predict new methods of harvesting will be

developed to increase access into and the merchantability of areas currently classified as inoperable. The form-letter respondents and an interest group submission state that deciduous species that were not included in the timber harvesting land base are becoming increasingly valuable and should be included.

- **Silviculture**

Industry submissions suggest that reducing the regeneration delay from four years to two years could increase the long-term timber supply by more than 2 per cent, based on an analysis completed by a consultant. Companies are already achieving a two-year delay in some cases. The submissions predict that intensive silviculture activity may increase timber supply in the future.

One submission comments that regenerating forests need to be well tended, specifically by brushing and weeding to remove unwanted species.

- **Commercial thinning**

Two industry submissions maintain that commercial thinning will increase in the future and may increase timber supply.

- **Environmental and socio-economic objectives**

One submission stresses the importance of maintaining biodiversity and healthy ecosystems and states that this must be a primary consideration of the chief forester. The respondent recognizes that the economy is important, but feels that it should not be given weight over all other interests because many people value the lifestyle provided by the non-timber values of the forest.

An industry submission questions whether the needs of recreation and tourism are not already reasonably met for this area due to the proximity of large parks. Another industry submission states that tourism is rated far too highly.

Several submissions comment on the importance to tourism of preservation of viewscapes, old growth, and riparian and wildlife habitat. One respondent states that timber harvesting, performed carefully and at a greatly reduced rate, could benefit tourism.

Two submissions recommend that the high economic value of old-growth timber be recognized in forest management and in the manufacturing of forest products, and that the emphasis should be on quality rather than quantity. One respondent remarks that the goal should be to increase the area of old growth.

One submission urges the province to provide employment brushing new forests, while another recommends that small operators be supported in order to create jobs. Another respondent predicts that if more riparian and wildlife areas are protected, employment will be created to enforce fish and wildlife regulations.

Three respondents raise the possibility that value-added manufacturing could provide jobs. One suggests an artificially high harvest level and the overcapacity of the large local mills discourage economic diversity. Another respondent remarks that more of the harvested wood fibre could be utilized.

An interest group submission predicts that reforestation of non-commercial cover and not-satisfactorily-restocked areas, rehabilitation of low-growing-potential and non-merchantable areas, and better utilization of waste wood on logged sites (at reduced stumpage rates) would help create employment

within the timber supply area as well as increase the allowable annual cut. Funding could come from Forest Renewal B.C.

One submission supports increased stumpage rates to fund re-training of displaced forestry workers, Forest Service research, and other forestry-related activities.

One submission calls for enforcement of Section 110 of the *Fish and Wildlife Act* to eliminate vehicular hunting access to all de-activated roads, thereby reducing the documented negative impact of increased hunter access to wildlife.

Allowable annual cut adjustment

The industry submissions, 36 form letters, a few individuals and one interest group recommend maintaining the current allowable annual cut to allow time for the economy to diversify and to explore options that will increase timber supply. The chief forester should await development of a Land and Resource Management Plan before any adjustments occur. One respondent suggests that the high proportion of older forests will, in the short term, support higher harvest rates than the sustainable long-term harvest level. One industry submission states the only reasons for a reduction in the allowable annual cut should be technical and scientific in order to maintain sustainable forest development for the area. Another submission asserts that the rate any reductions will take place is critical in minimizing impacts.

One submission recommends reducing the harvest by 10 per cent per year over the next 10 years to minimize the impact on the communities. The respondent says there has been little economic growth historically, and a slow reduction in the timber harvest may be offset by slow tourism growth.

Another submission contends the primary consideration of the chief forester must be to ensure that the resource is being managed sustainably. To accomplish this, the respondent recommends the allowable annual cut be reduced to 500,000 metres immediately, with a further 50,000-metre reduction every two years until the allowable annual cut is 20 per cent below whatever the long-term timber harvest level is established to be at that time.

In order to maintain other forest values and reduce the eventual fall-down effect, one submission supports an allowable annual cut in the vicinity of the existing average annual harvest of about 480,000 cubic metres per year

To preserve the environment and quality of life and to minimize the loss of biodiversity, three submissions support a 40 per cent reduction to the allowable annual cut. One other supports either a 17 per cent or 40 per cent reduction. Another submission declares the present rate of cut is not sustainable in the long term, so it should be lowered by 40 per cent to allow diversification of the economy before the downfall of the timber industry.

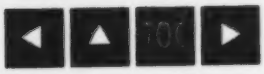
One submission supports an immediate allowable annual cut reduction in order to preserve options.

Two public submissions support an allowable annual cut reduction of about 50 per cent. One suggests that the environment will not sustain the current rate of harvest and that there is no way to prove tree plantations will produce wood fibre for the industry. The other states that this is the only way non-timber values in the timber supply area can be protected.

One public submission recommends the allowable annual cut be lowered by 75 per cent because the

balance of nature will be badly disrupted in the next 50 years. It contends that biodiversity will be destroyed, and expresses concern about the effect of harvesting on wildlife populations and habitat.

A spokesperson for the Mennonite community states they will work with whatever decision is made.



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Related processes and issues

Comments on other ongoing government processes in the Robson Valley Timber Supply Area are summarized here to indicate perspectives on issues that may influence timber supply in the future.

One submission cautions that the impacts of the Forest Practices Code and Protected Areas Strategy have not been considered. The respondent is hopeful that the Robson Valley Timber Supply Area has sufficient parks and will not need to protect any more land.

Another submission expresses concern that management for old-growth values has been nearly omitted from the Timber Supply Review. Another respondent remarks that protected areas are not even mentioned in the Timber Supply Review, yet the Robson Valley has 20 per cent currently set aside for them.

The Ministry of Environment, Lands and Parks submission states that the Local Resource Use Plans completed in the district were not comprehensive land-use plans. The respondent suggests that they focused primarily on visual quality objectives for forest management. Agencies other than the Forest Service had little input and most other resource values received only cursory attention, if any at all.

One submission calls for protection of the West Twin area to preserve the water, wildlife, and the potential for future generations to enjoy this unique ecosystem. Logging done to date in the area has affected water quality and caribou and other wildlife.

An industry submission contends that growth yields need to be based on a series of commercial thinnings before final harvesting. This incremental wood could be very significant, especially on the low-elevation areas in various valleys as well as in the entire Interior Cedar-Hemlock zone.

Two industry submissions note the current allowable annual cut of 596,377 cubic metres includes two temporary licences that expire in four years, at which time the allowable annual cut will be reduced to 496,377 cubic metres. One respondent suggests this would allow the harvest level to remain higher for a longer period of time than projected in the base case. The other one questions how this might affect the analysis, and whether the government intends to extend the licences for another six years.

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Appendix 1

Submissions received by the Robson Valley Forest District

Local government
Corporation of the Village of Valemount

Government agencies
Ministry of Environment, Lands and Parks, Omineca Region, Prince George

Forest industry
The Forest Company
Slocan Forest Products Ltd.
Zeidler Forest Industries Ltd.
JR Contracting
E.P. Runtz & Associates
TRC Cedar Ltd.
Mill workers and contracting companies (36)

Interest groups
Robson Valley Independent Forest Harvesting Group

Individuals
Fifteen submissions (of which five were Discussion Paper response forms)